

7/6/21

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
WEST. DIV. DAYTON

<b>UNITED STATES OF AMERICA,</b>	:	No. 3:21-cr-84
	:	Walter H. Rice
<b>Plaintiff,</b>	:	<u>I N F O R M A T I O N</u>
	:	
<b>v.</b>	:	8 U.S.C. § 1324(a)(1)(A)(v)(I)
	:	
<b>ALL STEEL CARPORTS, INC.,</b>	:	
	:	
<b>Defendant.</b>	:	

The United States Attorney charges:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A)(v)(I)]

I. INTRODUCTION

At all times relevant to this Information:

1. Defendant All Steel Carports, Inc., (hereinafter "All Steel") operates at 2200 North Granville Avenue, Muncie, IN 47303. All Steel is a business that provides services and products relating to the manufacture and installation of steel carports, garages, and sheds in multiple states, including Ohio.

II. THE CONSPIRACY

2. Between a date unknown, but at least by in or around January 2018, and in or around October 2019, defendant All Steel and others known to the United States Attorney knowingly conspired to encourage and induce aliens to come to, to enter and to reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

FORFEITURE ALLEGATION

Upon conviction of the offense set forth in Count One of the Information, defendant All Steel shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6), any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; any property, real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of such offense; and any property, real or personal, used to facilitate, or intended to be used to facilitate, the commission of such offense, including but not limited to:

1. A total of \$6,000,000.00, which is itemized as follows:
  - a. Funds in the amount of \$5,495,378.56 from JP Morgan Chase Bank, Account Number ending in 0446, in the name of All Steel Carports, Inc.;
  - b. Contents of JP Morgan Chase Bank, Account Number ending in 7705, in the name of United Metal Structures, LLC in the amount of \$151,212.09;
  - c. Contents of JP Morgan Chase Bank, Account Number ending in 6289, in the name of Ignacio Chavez-Castillo in the amount of \$121,255.44;
  - d. Contents of JP Morgan Chase Bank, Account Number ending in 0559, in the name of Chavez Real Estate, LLC in the amount of \$89,703.91;
  - e. \$88,405.00 in United States currency seized from All Steel Carports Inc.; and
  - f. \$54,045.00 in United States currency seized from All Steel Carports and Buildings, LLC;
2. A 2020 Chevy Silverado, VIN: 1GC4YVEY2LF294668, with all attachments thereon;
3. A 2020 Ford F-350, VIN: 1FT8W3DTXLED58107, with all attachments thereon; and
4. A 2020 Ford F-350, VIN: 1FT8W3DT7LEE04685, with all attachments thereon.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), up to the value of the property described above.

VIPAL J. PATEL  
Acting United States Attorney

*Brent G. Tabacchi*

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BRENT G. TABACCHI  
DWIGHT K. KELLER  
Assistant United States Attorneys